

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TERRENCE J. HANCOCK, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 20 C 0282
)	
ENVIRONMENTAL CLEANSING)	JUDGE JOHN J. THARP, JR.
CORPORATION, an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, ENVIRONMENTAL CLEANSING CORPORATION, an Illinois corporation, in the total amount of \$15,891.97, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,821.25.

On January 23, 2020, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Jeanna Stoffle, Employee) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on February 13, 2020. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that she mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 12th day of August 2020:

Mr. Matthew A. Konopko, Registered Agent/President
Environmental Cleansing Corporation
16612 S. Crawford Avenue
Markham, IL 60428-5378

The undersigned further certifies that she served the above-referenced document by electronic mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 12th day of August 2020:

Mr. Thomas J. Condon, Jr.
Peterson, Johnson & Murray, P.C.
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Chicago, IL 60606-5213
tcondon@pjmchicago.com

/s/ Cecilia M. Scanlon _____

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